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June 23, 2022

VIA ECF

Hon. Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Palo Alto Networks, Inc. v. Taasera Licensing LLC and Quest Patent Research Corporation*, No. 1:22-cv-02306-ER

Dear Judge Ramos:

This firm represents Plaintiff Palo Alto Networks, Inc. ("PAN") in the above captioned action. We are writing to request a stay of our opposition to Defendants' Motions to Dismiss pending jurisdictional discovery. The parties appeared before the Court last Thursday for the pre-motion conference on Defendants' Motions to Dismiss, and in accordance with the Court's order during that conference, PAN has submitted a cross-motion seeking jurisdictional discovery. We propose that the jurisdictional discovery be completed within 3 months, and that PAN have the standard 14 calendar days to respond after that. *See* Local Civil Rule 6.1. *See, e.g., Blockchain Mining Supply & Servs. Ltd. v. Super Crypto Mining, Inc.*, No. 18-cv-11099-ALC, 2020 WL 7128968, at *2 (S.D.N.Y. Dec. 4, 2020) (Court providing plaintiff four months to conduct jurisdictional discovery, and requesting a briefing schedule subsequent to completion of jurisdictional discovery).

Very truly yours,

/s/ Krishnan Padmanabhan
Krishnan Padmanabhan